



130 West Second Street Suite 900  
Dayton, Ohio 45402-1590  
Telephone: 937.228.2306 • Fax: 937.228.8475  
www.branlaw.com

DWIGHT D. BRANNON

DOUGLAS D. BRANNON

DAVID D. BRANNON

MATTHEW C. SCHULTZ

KEVIN A. BOWMAN

March 15, 2016

**Via Fax – 312-353-4135 and Regular Mail**  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

**Via Fax -937-285-6249 and Regular Mail**  
Ohio Environmental Protection Agency  
Southwest District  
401 East Fifth St.  
Dayton, Ohio 45402

Re: Mullins Rubber Products and Mullins Land Co.  
Riverside Valley Pike Neighborhood  
***Public Records Request Pursuant to §149.43***

To Whom It May Concern:

I am submitting this public records request to your attention pursuant to Ohio Revised Code §149.43, the Ohio Public Records Act. The “records” to be produced should include all originals of any nature whatsoever, identical copies, and all non-identical copies thereof pertaining to any medium upon which such information is recorded, and includes without limitation, all letters, e-mails, inter-office communications, drafts, compilations of data, computer generated materials and computer storage materials, correspondence, agreements, memoranda, reports, Court entries and pleadings, records of telephone calls, notes from meetings and notes in general. You are requested to produce copies of the following records:

- Complete copy of EPA agreement(s) with Mullins Rubber Products and/or Mullins Land Co. regarding removal of chemicals;
- Complete copy of all investigations conducted by EPA and Ohio EPA into Mullins Rubber Products and Mullins Land Co.;
- Complete list of all properties that have been sampled for PCE and TCE, along with locations where abatement systems have been installed;
- Complete information regarding movement of contamination;
- Complete information regarding payment of fines by Mullins Rubber Products and Mullins Land Co.; and
- Any other information regarding TCE and PCE contamination in the Riverside Valley Pike Neighborhood.

I request that these records be made available on or before **April 12, 2016**. Please contact me as soon as the records are ready for pick up. This office will pay all reasonable costs for reproduction of the records, upon presentation of an invoice. Should any record, as described above, not be subject to release or disclosure, please provide a description of the record with a detailed explanation of why the records are not subject to release or disclosure, including if you

do not believe such records to exist. Additionally, please let me know if the records are too voluminous for copying, and someone will inspect the records to determine which records are needed. If it is possible and the records can be delivered electronically, please deliver the records directly to my paralegal, Debra Walters at [dwalters@branlaw.com](mailto:dwalters@branlaw.com).

Do not hesitate to contact me to discuss this public records request. Thank you in advance for your attention to this matter.

Respectfully,

BRANNON & ASSOCIATES

Dwight K. Brannon